UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Adv. Pro. No. 08-01789 (SMB)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

(Substantively Consolidated)

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

MISCORK CORP. #1; MARTIN GETTINGER, in his capacity as Trustee for MISCORK CORP. #1; and MISCORK CORP.,

Defendants.

Adv. Pro. No. 10-05119 (SMB)

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation ("Stipulation") is submitted pursuant to the Bankruptcy Court's Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order ("Case Management Procedures Order").

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including February 2, 2015.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the Parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: New York, New York December 3, 2014 By: /s/ Howard L. Simon
Howard L. Simon, Esq. (hsimon@windelsmarx.com)
Kim M. Longo, Esq. (klongo@windelsmarx.com)
John J. Tepedino (jtepedino@windelsmarx.com)

Windels Marx Lane & Mittendorf, LLP

156 West 56th Street

New York, New York 10019 Telephone: (212) 237-1000 Facsimile: (212) 262-1215

Special Counsel for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff

Dated: Fort Lauderdale, FL December 2, 2014

By: <u>/s/ Michael I. Goldberg</u> Michael I. Goldberg, Esq.

(michael.goldberg@akerman.com)

Akerman Senterfitt LLP Las Olas Centre II, Suite 1600 350 East Las Olas Boulevard Fort Lauderdale, FL 33301 Telephone: (954) 463-2700 Facsimile: (954) 463-2224